

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-141-SLR
	:	
JESUS SALINAS-ESCAMILLA,	:	
	:	
Defendant.	:	

MOTION FOR CONTINUANCE OF SENTENCING

Defendant, Jesus Salinas-Escamilla, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order continuing the Sentencing Hearing in this case. In support of the motion, the defense submits as follows:

1. Mr. Salinas-Escamilla is scheduled for sentencing on June 6, 2007, at 8:30 a.m.
2. Defense counsel, Eleni Kousoulis, was assigned this case on May 29, 2007. Ms. Kousoulis took over the case from attorney Christopher Koyste. Ms. Kousoulis has not had the opportunity to meet with Mr. Salinas-Escamilla to discuss the case and any sentencing issues with him. Ms. Kousoulis respectfully requests a brief continuance of the Sentencing Hearing in this case to allow her the opportunity to meet with Mr. Salinas-Escamilla and to prepare for sentencing.
3. AUSA Robert Kravetz, the attorney handling this case for the government, does not oppose this request for a continuance.
4. Defense counsel spoke to the Court's chambers and was informed that the Court had

available June 8, 2007 at 11:00 a.m. in which to hold the Sentencing Hearing in this matter. All parties are available at that date and time.

WHEREFORE, Mr. Salinas-Escamilla respectfully requests that the Court continue the Sentencing Hearing in this matter to June 8, 2007 at 11:00 a.m.

Respectfully Submitted,

/s/

Eleni Kousoulis, Esquire
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Attorney for Defendant Salinas-Escamilla

DATED: June 4, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-141-SLR
	:	
JESUS SALINAS-ESCAMILLA,	:	
	:	
Defendant.	:	

ORDER

In response to Mr. Salinas-Escamilla's Motion for Continuance of Sentencing, this Court
HEREBY ORDERS on this _____ day of _____, 2007, that Defendant's Sentencing
Hearing is re-scheduled for the _____ day of _____, 2007 at _____ a.m./p.m.

The Honorable Sue L. Robinson
United States District Court